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Office of General Counsel  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 10, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Subject: Petition for Expedited Rulemaking to  
Establish Reporting Requirements and  
Performance and Technical Standards  
for Operations Support Systems  
RM 9101

Dear Mr. Caton:

Enclosed please find the original and four copies of the General Services Administration's Comments for filing in the above-referenced proceeding.

Sincerely,

Michael J. Ettner  
Senior Assistant General Counsel  
Personal Property Division

Enclosures

cc: International Transcription Service (diskette)  
Janice Myles (diskette)

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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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In the Matter of

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Establish Reporting Requirements and  
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Operations Support Systems

RM 9101

COMMENTS OF THE  
GENERAL SERVICES ADMINISTRATION

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July 10, 1997

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## Summary

National guidelines for standards governing operations support systems ("OSS") will help to achieve the benefits of local exchange competition. Competitors need consistent standards to participate efficiently in local markets, while end users need them to receive high quality telecommunications services from any carrier.

In the past year, state regulatory authorities have focused on the prices for unbundled network elements and interconnection services. Equally important, but not so widely reviewed, are the parameters that will govern carrier-to-carrier OSS interfaces. National guidelines are necessary because of the proliferation of competitive local exchange carriers serving multiple regions, and the needs of larger end users who must obtain local telecommunications services in separated areas.

There is little or no basic information concerning the existence of OSS standards for most local exchange carriers. Therefore, GSA urges the Commission to accept the recommendation by LCI International Telecom Corp. and the Competitive Telecommunications Association for an expedited order requiring large local exchange carriers to describe the OSS standards that they have established for themselves. GSA also urges the Commission to institute a proceeding to establish uniform national guidelines to assist state regulators in developing OSS standards.

GSA believes that a negotiated rulemaking would be the most efficient format for the recommended proceeding. In these comments, GSA outlines its recommendations for standards concerning pre-ordering, ordering, provisioning, billing, and maintenance and repair. These recommendations reflect GSA's needs for high quality local services with multiple carriers in exchanges scattered throughout the nation.

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of

Petition for Expedited Rulemaking to  
Establish Reporting Requirements and  
Performance and Technical Standards for  
Operations Support Systems

RM 9101

**COMMENTS OF THE  
GENERAL SERVICES ADMINISTRATION**

The General Services Administration ("GSA"), on behalf of the Federal Executive Agencies ("FEAs"), submits these Comments in response to the Commission's Public Notice released June 10, 1997. The Commission's notice requests comments and replies on a joint petition by LCI International Telecom Corp. and the Competitive Telecommunications Association ("Petitioners") for an expedited proceeding to address issues concerning standards for operations support systems ("OSS").

**I. INTRODUCTION**

Pursuant to Section 201(a)(4) of the Federal Property and Administrative Services Act of 1949, as amended, 40 U.S.C. 481(a)(4), GSA is vested with the responsibility to represent the customer interests of the FEAs before Federal and state regulatory agencies. The FEAs are substantial users of interexchange and local telecommunications services throughout the nation. From this perspective, GSA has

consistently supported the Commission's efforts to bring the benefits of competitive telecommunications markets to all consumers.

The Petitioners are requesting the Commission to institute an expedited rulemaking proceeding to establish performance goals that are necessary for incumbent local exchange carriers ("ILECs") to comply with the Commission's First Report and Order in CC Docket No. 96-98.<sup>1</sup> The Petitioners state that this action is appropriate because: 1) not one ILEC has met its burden of demonstrating that it is providing nondiscriminatory access to its OSS, in spite of the Commission's January 1, 1997 deadline for this milestone; and 2) the substantial debate concerning appropriate OSS access criteria and standards is impeding compliance with the Commission's directives.<sup>2</sup>

As the first step, the Petitioners request that the Commission issue an expedited order requiring each incumbent carrier to disclose whether or not it has set performance standards for itself concerning each of its OSS functions, and to describe any standards that the company has established. Secondly, the Petitioners ask the Commission to initiate a proceeding to determine the appropriate minimum performance standards for each OSS function.

On June 10, 1997, the Commission issued a Public Notice inviting parties to comment on whether or not it should accept the Petitioners' requests for disclosure of existing OSS standards and their concurrent request for a proceeding to establish

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<sup>1</sup> Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, First Report and Order, CC Docket No. 96-98, 11 FCC Rcd 15499 (1996), motion for stay denied, 11 FCC Rcd 11754 (1996), Order on Reconsideration, 11 FCC Rcd 13042 (1996), Second Order on Reconsideration, 11 FCC Rcd 19738 (1996), further recon. pending, appeal pending sub nom. Iowa Util. Bd. v. FCC and consolidated cases, No. 96-3321 et al., partial stay granted pending review, 109 F.3d 418 (8th Cir. 1996), order lifting stay in part (8th Cir. Nov. 1, 1996), motion to vacate stay denied, 117 S. Ct. 429 (1996).

<sup>2</sup> LCI International Telecom Corp. and Competitive Telecommunications Association Joint Petition for Expedited Rulemaking, May 30, 1997 ("Petition"), p. i.

minimum OSS standards.<sup>3</sup> The Commission also invited parties to suggest specific OSS standards that should be included in a subsequent Notice of Proposed Rulemaking. In addition, the Commission invited parties to comment on whether a negotiated rulemaking might be the best method for developing national guidelines concerning OSS standards.

Based on its experience in recent regulatory proceedings and its role as a large user of telecommunications nationwide, GSA is convinced that comprehensive uniform guidelines for OSS are necessary to allow end users to enjoy the benefits of competition. Consequently, GSA provides the following comments in response to the Commission's Notice.

## **II. OSS STANDARDS ARE REQUIRED AT THE LOCAL LEVEL TO ACHIEVE THE BENEFITS OF COMPETITION.**

### **A. Standards are required for competitors to participate in local exchange markets.**

Large ILECs still control nearly all of the infrastructure in every major local telecommunications market. The OSS functions, which include pre-ordering, ordering, provisioning, billing, maintenance and repair, are an important part of this infrastructure. Access to OSS maintained by the ILECs is mandatory in order to:

- allow end users to order service from CLECs (pre-ordering);
- enable ILECs to process orders by CLECs (ordering);
- provide end users with services when they are needed (provisioning);
- provide CLECs with timely and accurate invoices (billing); and

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<sup>3</sup> Public Notice, Comments Requested on Petition for Expedited Rulemaking to Establish Reporting Requirements, and Performance and Technical Standards for Operations Support Systems, RM 9101, June 10, 1997 ("Public Notice").

- monitor service levels and perform repairs when necessary (maintenance and repair).<sup>4</sup>

In its First Report and Order, the Commission explained the importance of placing OSS access requirements on the ILECs, stating that “[i]t is absolutely necessary for competitive carriers to have access to OSS functions in order to successfully enter the local service market.”<sup>5</sup> Recognizing that the CLECs need OSS to provide their own services, the Commission stated that ILECs must provide access “[a]s expeditiously as possible, but in no event later than January 1, 1997.”<sup>6</sup>

The deadline for nondiscriminatory OSS access is six months past, but the Petitioners report that ILECs are doing little to develop standardized approaches to these critical interfaces.<sup>7</sup> In fact, some ILECs have even refused to identify the measurement criteria for CLECs to employ in determining whether or not they are receiving access to OSS functions equivalent to the access provided to the ILEC’s own operating units.<sup>8</sup>

**B. Standards are required for end users to receive high quality telecommunications services from any carrier.**

End users have a direct stake in OSS standards, because interconnecting carriers must receive high quality services from the ILECs in order to provide high quality services to their own customers.

GSA filed Comments on June 2, 1997 in CC Docket No. 95–116 to explain the importance of standards concerning telephone number portability.<sup>9</sup> In those comments, GSA recommended that the Commission initiate a proceeding to develop national

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<sup>4</sup> Petition, p. 6.

<sup>5</sup> First Report and Order, para. 521.

<sup>6</sup> *Id.*, paras. 316, 516–17, 525.

<sup>7</sup> Petition, p. iii.

<sup>8</sup> *Id.*, p. 7.

<sup>9</sup> CC Docket No. 95–116, GSA Comments, June 2, 1997.



guidelines concerning other facets of competitive local telecommunications, including operations support systems. GSA provided information on deficiencies concerning provisioning, maintenance and repair standards that were evident in recent reviews of ILEC's filings conducted by state regulatory authorities.<sup>10</sup>

In the past few years, the FEAs have participated in proceedings before state regulatory agencies to address the rates, terms and conditions for unbundled network elements and interconnection services.<sup>11</sup> As GSA stated in its Comments to the Commission in CC Docket No. 95-116, the evidence in these cases has demonstrated that incumbent local exchange carriers have not given sufficient attention to the need for efficient operations support to competitive local carriers.<sup>12</sup>

For example, GSA explained that the terms and conditions proposed by ILECs for unbundled network elements and interconnection services to competing carriers have not included procedures for coordinating repair activities.<sup>13</sup> Statements of Generally Available Terms and Conditions for unbundled network elements and interconnection services provided to competitors typically contain only vague commitments that the incumbent carrier will provide a minimum amount of information to end users.<sup>14</sup> These statements do not describe procedures for responding to service interruptions with multiple carriers, nor do they reference targets for service

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<sup>10</sup> *Id.*, pp. 6-10.

<sup>11</sup> For example, District of Columbia Public Service Commission Formal Case No. 962, Georgia Public Service Commission Docket No. 7061-U, Maryland Public Service Commission Case No. 8731, New Jersey Board of Public Utilities Docket No. TX95120631, New York Public Service Commission Case Nos. 95-C-0657, 94-C-0095 and 91-C-1174, and Virginia State Corporation Commission Case No. PUC970005.

<sup>12</sup> CC Docket No. 95-116, GSA Comments, June 2, 1997, p. 5.

<sup>13</sup> *Id.*, pp. 9-10.

<sup>14</sup> *Id.*, pp. 5-9.

restoration.<sup>15</sup> The proposed statements do not even reference any previously applicable standards.

**C. The absence of comprehensive OSS standards has already presented a barrier to competition.**

The absence of effective standards for operations support to interconnecting carriers has already presented a significant barrier to the development of local exchange competition. For example, on May 21, 1997, Ameritech–Michigan (“Ameritech”) filed an application with the Commission for authority to provide in–region interLATA services pursuant to Section 271 of the Telecommunications Act.<sup>16</sup>

This legislation requires the Commission to consult with state regulators to verify the applicant’s compliance with a variety of requirements for certification to provide in–region services. When consulted on the matter, the Michigan Public Service Commission raised questions concerning several of the requirements for certification, but focused on one checklist item — Ameritech’s OSS.<sup>17</sup> In this connection, Michigan regulators stated that it was difficult to determine whether or not the company satisfied the OSS requirements because there were no OSS standards to employ.<sup>18</sup>

GSA urges the Commission to help avoid uncertainties or controversies in the future by establishing guidelines for state regulators to reference in developing their own OSS standards. Guidelines that reduce disputes among carriers will help end users by bringing the benefits of open competition to all markets as soon as possible.

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<sup>15</sup> *Id.*, pp. 9–10.

<sup>16</sup> Telecommunications Act of 1996, 47 U.S.C. 151 *et. seq.* (“Telecommunications Act”), Section 271(d)(2)(B).

<sup>17</sup> *Telecommunications Reports*, June 16, 1997, pp. 9–10.

<sup>18</sup> *Id.*

**D. Local competition places new requirements for service standards.**

Over the years, many state regulators have developed standards concerning ordering, billing, maintenance and repair functions for services provided directly to end users. For example, major LECs are often required to submit data to state regulators on the time required to restore interrupted telephone services. However, the fact that multiple local exchange carriers are serving an exchange adds new dimensions to the measurement of the quality of service received by end users. For example, billing and ordering interfaces must be compatible among all local carriers so that end users can systematically order services and audit the invoices that they receive from multiple carriers.

During the past year, state regulatory agencies have focused their investigations on interconnection charges. Few proceedings have addressed issues concerning service standards for unbundled network elements and interconnection services provided to competing carriers. The Commission can fill an important need by providing guidance concerning standards for OSS requirements with interconnected local carriers.

**E. Uniform national guidelines for local OSS standards would improve service for geographically dispersed CLECs and end users.**

The Petitioners report that since LECs employ a variety of methods to provide OSS, local exchange competitors face the significant burden of using distinct systems and software in each geographical area.<sup>19</sup> Even if state regulatory agencies can develop their own OSS standards, national guidelines are important for CLECs operating in multiple areas. Uniform standards are particularly important because

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<sup>19</sup> Petition, p. iii.

mergers and market expansions are likely to change the mix of service providers significantly in the next few years.

Uniform standards are also important for end users such as GSA, who contract for local telecommunications services in many locations throughout the nation. Users must be able to anticipate uniformly high quality services in every state, as well as timely invoices and uniform ordering formats, independent of interconnections or other arrangements between local exchange carriers. As additional firms offer new services, standards are needed to allow end users to enjoy the benefits of competition.

**III. THE COMMISSION SHOULD ISSUE AN EXPEDITED ORDER REQUIRING INCUMBENT LOCAL CARRIERS TO DISCLOSE THEIR EXISTING PERFORMANCE STANDARDS FOR OSS.**

To provide basic information on OSS access, the Petitioners request that the Commission enter an expedited order requiring that:

- each ILEC disclose: (a) each OSS function for which it has established performance standards for itself; and (b) each OSS function for which it has not established such performance standards; and
- any ILEC that has established such performance standards provide descriptions of those standards, and also provide appropriate historical data and measurement criteria.<sup>20</sup>

The Petitioners explain that this information will help regulators and carriers to assess the future needs for OSS standards that can foster open competition.<sup>21</sup>

GSA urges the Commission to issue an Order requiring ILECs to provide the information identified by the Petitioners. This information will help the Commission to assess the most pressing needs of state regulators for uniform OSS standards.

In the notice establishing the current proceeding, the Commission asked carriers to specify the OSS functions that are currently available on an unbundled basis, and

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<sup>20</sup> *Id.*, p. v.

<sup>21</sup> *Id.*, pp. 2–3.

also to specify the OSS functions that are currently available for resale. GSA recommends that any major ILEC not providing this information as part of its comments be required to do so when providing the standards information identified by the Petitioners.

GSA recommends that the Commission issue its Order on an expedited basis, saving the time required for an additional round of comments. All ILECs should be required to provide all of the information identified by the Petitioners within 30 days of the Commission's order.

Even if the Commission decides not to initiate a proceeding to establish national guidelines, GSA believes that ILECs should be ordered to provide the basic information on existing OSS standards requested by the Petitioners. In the first place, this information will enable CLECs to estimate the extent of operations support that they can expect now from each ILEC. Secondly, the information will permit the Commission and end users to make comparisons of ILECs with respect to OSS access. Finally, the information will provide guidance to ILECs that have been slow to respond to the Commission's requirements and will create incentives for OSS access compliance.

#### **IV. THE COMMISSION SHOULD INSTITUTE A PROCEEDING TO ESTABLISH UNIFORM NATIONAL GUIDELINES TO ASSIST STATE REGULATORS IN DEVELOPING OSS STANDARDS.**

The Petitioners' recommendations concerning the requirements for OSS standards are well considered.<sup>22</sup> GSA recommends that the Commission institute a proceeding to establish uniform national guidelines to assist state regulatory authorities in developing standards. GSA recommends that this proceeding commence on a date shortly after information on existing standards is received from the ILECs. This procedure will enable parties preparing comments to view the present range of

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<sup>22</sup> *Id.*, p. 88.

standards (or lack thereof) and to develop more informed recommendations for appropriate action by the Commission.

While national uniformity in OSS standards has important advantages, GSA recognizes that state regulatory authorities have valuable experience in developing and administering standards for many of the activities (such as billing and maintenance) which will now be performed by ILECs in a multi-carrier environment. To build on this experience, GSA recommends that the Commission focus the new proceeding on minimum performance levels that can serve as guidelines to state regulators.

In a recent Memorandum Opinion and Order in CC Docket No. 87-313, the Commission addressed several issues concerning service quality and infrastructure development for LECs under price cap regulation.<sup>23</sup> The Commission affirmed decisions by the Common Carrier Bureau to use ARMIS reports to compare the actual service quality levels for these carriers.<sup>24</sup> The Commission rejected claims that this procedure creates *de facto* national performance standards, noting that it allows the Common Carrier Bureau to make "ARMIS reports more uniform in how they classify services and define intervals, units of measurements and other reporting factors."<sup>25</sup>

The Commission's findings in CC Docket No. 87-313 apply equally to OSS standards. The Commission should reject any claims by local exchange carriers or others that national standards constitute superfluous regulation. GSA urges the Commission to accept the Petitioners' recommendations for a proceeding to establish minimum OSS requirements at this time.

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<sup>23</sup> Memorandum Opinion and Order CC Docket No. 87-313, released May 30, 1997.

<sup>24</sup> *Id.*, para. 61.

<sup>25</sup> *Id.*

**V. GSA PROPOSES GUIDELINES THAT WILL HELP END USERS TO OBTAIN HIGH QUALITY SERVICES IN ALL AREAS.**

In the following sections of these comments, GSA outlines its recommendations for guidelines that address OSS functions with interconnected local exchange providers. These recommendations reflect GSA's need for consistently high quality local telecommunications services in exchanges scattered throughout the nation. GSA intends to participate in any proceeding that the Commission designates to address these standards and others that will help to ensure that end users receive high quality telecommunications services in all areas.

**A. Pre-ordering**

- requirements for all carriers to provide complete and accurate information on all of their service offerings, and to provide pricing information in a form allowing end users to compare these services with services available from other carriers;
- needs for all carriers to publicize their telephone numbers and any other means of communication that consumers can employ to obtain new services or change their existing services;
- needs of some end users for electronic interfaces for ordering services from local exchange carriers;
- requirements for all carriers to answer requests for new or changed services promptly and to provide firm deadlines for meeting end users' requests; and
- compensation to end users by carriers not providing complete or accurate information, or not meeting firm service installation commitments.

**B. Ordering**

- needs for ILECs to provide efficient electronic interfaces for CLECs to use in ordering unbundled network elements or interconnection services to meet the needs of their own subscribers; and
- requirements on ILECs to make firm commitments for availability of unbundled network elements and interconnection services with turnaround times that enable CLECs to satisfy commitments to their own customers.

**C. Provisioning**

- requirements on ILECs to make unbundled network elements and interconnection services available in sufficient quantities to allow CLECs to compete in providing all telecommunications services that they choose to offer to their own customers; and
- requirements for all carriers to maintain uninterrupted interconnections and take no actions that would impair the ability of any other carrier to offer services or meet its commitments to its customers.

**D. Billing**

- requirements on all carriers to render accurate invoices promptly;
- needs of some end users for electronic billing in mutually agreeable formats;
- requirements for all carriers to resolve billing disputes promptly; and
- requirements for significant compensation to end users by carriers not providing accurate invoices.

**E. Maintenance and Repair**

- requirements for all carriers to publicize their telephone numbers and any other means of communication that consumers can employ to report service outages and to arrange for restoration of service;
- requirements for all carriers to meet repair responsibilities promptly and to provide firm deadlines for restoration of service even if other carriers are involved;
- requirements for all carriers to defer issues of blame for interruptions and issues of cost responsibility until all service is fully restored; and
- requirements for significant compensation to end users by carriers allowing service interruptions to continue beyond set periods or for failing to meet their commitments to restore service to users by a specified deadline.



**VI. A NEGOTIATED RULEMAKING IS THE MOST EFFICIENT STRUCTURE FOR A PROCEEDING TO DEVELOP GUIDELINES.**

GSA urges the Commission to employ a negotiated rulemaking format for the proceeding to establish guidelines for OSS standards. A negotiated rulemaking format permits more opportunities for information exchange concerning highly complex technical issues. By concentrating sessions on a weekly or biweekly basis, groups should be able to develop agreements and written positions for presentation to the Commission in a much shorter period than would be needed with a Notice and Comment Proceeding on this subject.

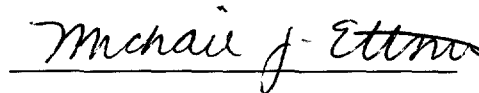
## VII. CONCLUSION

As the agency vested with the responsibility for acquiring telecommunications services for the Federal Executive Agencies, GSA urges the Commission to adopt the recommendations set forth in these Comments.

Respectfully submitted,

EMILY C. HEWITT  
General Counsel

GEORGE N. BARCLAY  
Acting Associate General Counsel  
Personal Property Division

A handwritten signature in cursive script, reading "Michael J. Ettner", written over a horizontal line.

MICHAEL J. ETTNER  
Senior Assistant General Counsel  
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July 10, 1997

## CERTIFICATE OF SERVICE

I, MICHAEL J. ETTNER, do hereby certify that copies of the foregoing "Comments of the General Services Administration" were served this 10th day of July, 1997, by hand delivery or postage paid to the following parties:

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